

HE 04.16.2021

ZAM/CMR: USAO#2020R00768

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

DESMOND BABLOO SINGH,

Defendant

*
*
*
*
*
*
*

CRIM. NO. **ROB-21-0116**

(Cyberstalking, 18 U.S.C.
§ 2261A(2); Aggravated Identity
Theft, 18 U.S.C. § 1028A)

INDICTMENT

COUNTS ONE AND TWO
(Cyberstalking)

FILED ENTERED
LODGED RECEIVED

APR 21 2021

AT BALTIMORE
CLERK U.S. DISTRICT COURT
DISTRICT OF MARYLAND DEPUTY

BY

The Grand Jury for the District of Maryland charges that:

At all times material to this Indictment:

1. Defendant **DESMOND BABLOO SINGH** ("SINGH"), born June 2001, was a resident of New York.

2. "Victim 1," a female, was a resident of Maryland, who become the primary target of a months' long cyberstalking and harassment campaign carried out by **SINGH**.

3. "Victim 2," a male acquaintance of Victim 1, was a resident of Maryland, who also became a target of **SINGH**'s cyberstalking and harassment.

SINGH's Harassment and Cyberstalking Campaign Against Victims 1 & 2

4. In approximately 2013-2014, when Victim 1 was a middle school student in Maryland, she was a friend of **SINGH**'s older sister during one school year. At the end of the school year, **SINGH**'s family relocated to Texas.

5. Victim 1 never met **SINGH** in person and was never in any sort of relationship with **SINGH**. Victim 1 only knew **SINGH** as the younger brother of an old friend from middle school.

6. Around the time the **SINGH** family moved to Texas, **SINGH** began “following” Victim 1, who continued to reside in Maryland, on multiple social media platforms. Between approximately 2014 and February 14, 2020, Victim 1 and **SINGH** had only a handful of online or text message conversations, including a few text messages in November and December 2019.

7. On or about Valentine’s Day (February 14), 2020, **SINGH** shared with Victim 1 a private Instagram story in which he unequivocally professed his love for her. The private story, which contained an image of a necklace **SINGH** said he had purchased for Victim 1, also linked to an online blurb authored by **SINGH** in which he further professed his love for Victim 1. Victim 1 rejected **SINGH**’s romantic advances and asked **SINGH** not to contact her any further.

8. Over the course of the next ten months, **SINGH** orchestrated and carried out a relentless cyberstalking and harassment campaign against Victim 1. **SINGH** orchestrated and carried out a similar cyberstalking and harassment campaign against Victim 2, an associate of Victim 1, who **SINGH** apparently perceived as a romantic rival.

9. Specifically, beginning on or about April 18, 2020, and continuing through at least on or about November 24, 2020, **SINGH** used more than one hundred different social media, electronic communication, and phone accounts to send Victim 1 harassing communications. These communications, which included public posts, private social media messages, text messages, and other online postings, included express and implied threats of death and bodily injury, sexualized violence, and racial slurs. **SINGH** frequently used images of Victim 1 in the harassing communications, in which he denigrated the victim’s character and appearance. **SINGH** also used the accounts to post content encouraging others to harass Victim 1.

a. Many of the social media accounts created and used by **SINGH** incorporated Victim 1's name, making it appear as if the accounts were owned and operated by Victim 1.

b. **SINGH** also "doxed" Victim 1 on a number of occasions, publicly posting her address, phone number, and electronic accounts. By "doxing" Victim 1, **SINGH** encouraged others to take action—online or in person—against Victim 1. In one online posting, for example, **SINGH** listed Victim 1's name, birth date, phone number, school, social media identities, and other identifying information, accompanied by the text: "UGLY [RACIAL SLUR] GIRL PLS DO MORE TO HER."

10. Victim 1 pleaded with **SINGH** and his immediate family members to put an end to the harassment campaign, but to no avail. In or about May 2020, Victim 1 told **SINGH** over text message that if he didn't stop harassing her, she would seek a no-contact order. **SINGH** responded on or about May 30, 2020, stating: "[E]xpect a wave of the worst possible shit to happen to you lmao." On or about June 2, 2020, **SINGH** added: "[Y]ou think im kidding im genuinely never going to stop[,] it's going to be really funny[,] your fucking fat ass thought you could fuck with me like this lmfao."

11. On or about July 19, 2020, Victim 1 received an Instagram follow request from one of the harassing accounts created by **SINGH**. The account included pictures of Victim 1 and her house. The account had also posted Victim 1's parents' address in Maryland and stated there would be a party there the following day.

12. On or about July 20, 2020, Victim 1's parents' residence was the target of a "swatting" attack, meaning that someone contacted law enforcement to falsely report an emergency at the residence. Specifically, a Baltimore County, Maryland, employee received an

anonymous email telling law enforcement to investigate “ASAP” a possible bomb at Victim 1’s parents’ home. Law enforcement officers responded to the home, but subsequently determined that the bomb threat was a hoax.

13. On or about July 21, 2020, **SINGH** texted Victim 1 from an anonymous number he controlled, writing “you’re getting swatted.” **SINGH** followed this text message with the following: “ur dads SSN [XXX-XX-XXXX].”

14. **SINGH**’s harassment campaign also involved gaining unauthorized access to Victim 1’s social media accounts. Specifically, on or about July 19, 2020, **SINGH** gained unauthorized access to Victim 1’s Snapchat account and changed the email address associated with the account to an email account created and controlled by him.

15. As a result of **SINGH**’s unauthorized access to Victim 1’s Snapchat account, **SINGH** obtained personal images of Victim 1 that had been privately stored in her account. **SINGH** subsequently shared these personal images of Victim 1 online, in the harassing accounts he created, and in text messages he sent to Victim 1’s family members.

16. On or about November 23, 2020, **SINGH** gained unauthorized access to Victim 1’s TikTok account and changed the email associated with the account. Once in control of the account, **SINGH** posted several pictures of himself with the caption “omg he’s so hot!!!”

17. **SINGH**’s cyberstalking and harassment campaign also targeted Victim 2. As he did with Victim 1, **SINGH** created numerous social media accounts intended to harass and intimidate Victim 2; the account names, many of which incorporated Victim 2’s name, commonly denigrated Victim 2. One such account included the caption, “Loser Ugly Broke [Homophobic Slur],” under Victim 2’s name. **SINGH** also used the accounts to post pictures of Victim 2 and “dox” him.

18. The course of conduct targeting Victim 2 also included repeated threats to seek out and fight Victim 2. On or about July 18, 2020, **SINGH**, using an anonymous Twitter account he created, posted a video, in which an unidentified person is seen knocking on the front door of a residence where Victim 2 previously lived (apparently believing Victim 2 still lived there). **SINGH** tagged Victim 2 in the Twitter post, telling him to answer the door. **SINGH** later posted the same video to YouTube, which included Victim 2's name, the real address of Victim 2's former residence, and **SINGH**'s statement that he went to that location to fight Victim 2.

19. **SINGH**'s threats of violence against Victim 2 also extended to posts **SINGH** made on other social media accounts and in messages he sent directly to Victim 2. For instance, **SINGH** sent numerous text messages to Victim 2 directing him to "pull up" to specific locations in Baltimore, Maryland, so that **SINGH** could fight him.

The Charges

20. On or about the dates listed below, in the District of Maryland, the Southern and Eastern Districts of New York, and elsewhere, the Defendant,

DESMOND BABLOO SINGH,

with the intent to kill, injure, harass, intimidate, and place under surveillance with intent to kill, injure, harass, and intimidate Victim 1 and Victim 2, used any interactive computer service, electronic communication service and electronic communication system of interstate commerce, or any other facility of interstate or foreign commerce to engage in a course of conduct that placed Victim 1 and Victim 2, each victim being a separate count, in reasonable fear of the death of or serious bodily injury and caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to the person.

COUNT	DATES	VICTIM
ONE	April 18, 2020 – Nov. 24, 2020	Victim 1
TWO	May 9, 2020 – Nov. 8, 2020	Victim 2

18 U.S.C. § 2261A(2)

18 U.S.C. § 2

COUNTS THREE AND FOUR
(Aggravated Identity Theft)

The Grand Jury for the District of Maryland further charges that:

21. Paragraphs 1 through 19 of Counts One through Two are hereby incorporated by reference as though fully set forth herein.

22. On or about the dates listed below, in the District of Maryland, the Southern and Eastern Districts of New York, and elsewhere, the Defendant,

DESMOND BABLOO SINGH,

did knowingly transfer, possess and use and attempt to use, without lawful authority, a means of identification of another person, to wit: the Defendant possessed and used the electronic account credentials of Victim 1, without lawful authority, during and in relation to Wire Fraud, 18 U.S.C. § 1343, and Intentional Damage to a Protected Computer, 18 U.S.C. § 1030(a)(5)(A):

COUNT	DATE	PERSON	COMPUTER SYSTEM
THREE	July 19, 2020	Victim 1	Snapchat
FOUR	November 23, 2020	Victim 1	TikTok

18 U.S.C. §§ 1028A(a)(1), (c)(4) and (c)(5)
18 U.S.C. § 2

Jonathan F. Lenzner / CMR
Jonathan F. Lenzner
Acting United States Attorney

Date: 4-21-21

SIGNATURE REDACTED

Foreperson